

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

In the Matter of the Search of

(Name, address or brief description of person, property or premises to be searched)

8 POUND 4 OUNCE EXPRESS MAIL PARCEL, LABEL NO.  
ED654664163US, ADDRESSED TO [REDACTED]  
WILLMINGTON (SIC), DE 19808 MEASURED 15 3/4" X 9" X 9"  
POSTMARKED MARCH 30, 2005

APPLICATION AND AFFIDAVIT  
FOR SEARCH WARRANT

CASE NUMBER: 05-58 -M

I, YVETTE A. THOMAS being duly sworn, depose and say:

I am a(n) UNITED STATES POSTAL INSPECTOR and have reason to believe that ☐ on the person of or

☒ on the property or premises known as (name, description and/or location)

8 POUND 4 OUNCE EXPRESS MAIL PARCEL, LABEL NO. ED654664163US, ADDRESSED TO [REDACTED],  
[REDACTED] 19808 MEASURED 15 3/4" X 9" X 9" POSTMARKED MARCH 30, 2005

REDACTED

in the District of Delaware, there is now concealed a certain person or property, namely  
(describe the person or property to be seized)

CONTROLLED SUBSTANCES AND UNITED STATES CURRENCY

which is (state one or more bases for search and seizure set forth under Rule 41(b) of the Federal Rules of Criminal Procedure)

PROPERTY WHICH CONSTITUTES EVIDENCE OF THE COMMISSION OF A CRIMINAL  
OFFENSE

concerning a violation of Title 21, United States Code, Section(s) 841(a) (1), 843 (b), and 846 .  
The facts to support a finding of Probable Cause are as follows:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof.

X Yes ☐ No

Yvette A. Thomas

Signature of Affiant

Sworn to before me and subscribed in my presence

April 1, 2005

Date

THE HONORABLE MARY PAT THYNGE  
UNITED STATES MAGISTRATE JUDGE

Name and Title of Issuing Officer

at Wilmington, Delaware

City and State

Signature of Issuing Officer

**A F F I D A V I T**

1. Your affiant is Yvette A. Thomas, a United States Postal Inspector ("USPI"). I have been so employed for 2 years. Prior to my assignment as a United States Postal Inspector, I was employed by the Wilmington, Delaware Police Department for approximately 6 years; 1 ½ years as a Police Officer and 4 ½ years as a Police Detective. I was employed by the Milford, Delaware Police Department, 3 years as a Police Officer and 1 year as a Detective. I have a total of 7 ½ years of investigative experience with 5 of those years involving narcotics investigations. I am presently assigned to the Philadelphia, PA High Intensity Drug Trafficking Area (HIDTA) Parcel Squad, which investigates the use of the U.S. Mails and other overnight delivery services to transport controlled substances in violation of Title 21, United States Code, §§ 841(a)(1), 843(b), 846, 853(a) and 881(a)(6). I have received training in narcotics investigations and narcotics trafficking via the U.S. Mails from the U.S. Postal Inspection Service and the Drug Enforcement Administration. I have personally seen most commonly known controlled substances and the paraphernalia used for weighing, packaging and using controlled substances. I have participated in investigations, which have resulted in the arrest of individuals who have received and distributed controlled substance, as well as the seizure of the illegal drugs and proceeds from the sale of those illegal drugs.
2. On January 11, 2005 U.S. Postal Inspector Andrew Katerman advised me that he was contacted by QVC in Harrisburg, PA in regards to a package that they had opened in error which was found to contain United States Currency and no note. Inspector Katerman received a Priority Mail envelope with delivery confirmation #0300 1290 0000 0696 8767 which is addressed to [REDACTED] U.S.A. from [REDACTED] [REDACTED] U.S.A measuring 10" x 6" (letter flat) and weighing 5 ounces. The envelope was found to contain \$3,000.00 in United States Currency.
3. Delivery confirmation is a service offered by the U.S. Post Office in order to track a parcel or letter flat to confirm the delivery of said mail.

4. A check of postal records of the return address indicates the address is a good address. [REDACTED] receives mail at that location according to the letter carrier. A check of the addressee indicated that the address is a good address but there was no listing for a [REDACTED]
5. Based on your affiant's service with the U.S. Postal Inspection Service and prior investigations, your affiant has become familiar with the mechanics of the overnight delivery services and has developed a good understanding of the appeal these services have for those who choose it for the illegal transportation of controlled substances. Overnight delivery services offer rapid and dependable service for most metropolitan areas. Parcels deposited before 5:00 p.m. are guaranteed for delivery the following day, with a refund if the parcel does not meet the service standards. To the smuggler, the refund is a minor consideration, but parcels delayed beyond the normal delivery time serve to alert the recipient that the authorities may have discovered the controlled substances. Additionally, overnight shipments have an assigned label number which makes the parcel easy to trace and the sender is given a time of shipment, plus the weight of the parcel.
6. From my training and experience, I know that illegal transactions in controlled substances are typically conducted with United States Currency. United States Currency is used to pay for illegal controlled substance because of the readily identifiable value and because of the difficulty in tracing currency transactions. As a result, large quantities of United States Currency are a "tool of the trade" of illegal drug trafficking and the presence of a large quantity of United States Currency is an indicator of drug trafficking activity.
7. On January 25, 2005 during routine interdiction at the Air Mail Facility in Philadelphia, Postal Inspectors of the HIDTA Parcel Squad identified a suspicious Express Mail parcel originating from Little Rock, AR destined for an address in Wilmington, DE.

8. The Express Mail parcel, Tracking No. ED487053756US is addressed to [REDACTED]  
[REDACTED] 19808 U.S.A. from [REDACTED]  
[REDACTED] U.S.A measuring 12 ½ " x 9 ½ " (letter flat) and weighing 12 ounces.  
The Express Mail parcel bared the same writing characteristics as the Priority Mail envelope that was found to contain \$3,000.00 in United States Currency. As of this date, there have been no inquiries to the Priority Mail parcel from either the sender or receiver.
9. It is the experience of your Affiant, as well as many other law enforcement officers engaged in the investigation of narcotic offenses, that the packages and the money representing proceeds of narcotics handled by narcotic dealers will retain traces of the narcotics. Because of this, odor of the narcotics on currency and in packages containing narcotics is many times detectable by narcotic detection canines.
10. On January 25, 2005, the subject parcel was exposed to a drug detection canine named "Thunder", Badge No. 8072A. "Thunder" is employed by the Pennsylvania State Police and is handled by Trooper Stephen U'Selis, Badge No. 8072. "Thunder" was trained at the Pennsylvania State Police Academy, training unit in Hershey, PA. "Thunder" has ongoing training and is re-certified once a year. "Thunder" is 7 years old and has been employed by the Pennsylvania State Police Department since August of 2000. He has been credited with more than 500 searches where narcotics were found. "Thunder" is trained to detect methamphetamine, marijuana, hashish, cocaine, heroin and their derivatives. Trooper U'Selis has 7 years experience in law enforcement and has handled "Thunder" since August 2000. Trooper U'Selis indicated that "Thunder" alerted positive to the presence of controlled substances in the parcel.



11. On January 28, 2005, a federal search warrant from the District of Delaware #05-10M-MPT was signed by The Honorable Mary Pat Thyng for Express Mail Parcel #ED487053756US. The search warrant was executed on January 28, 2005 at approximately 3:40 p.m. in the presence of U.S. Postal Inspectors Yvette Thomas and Jane Mullin. The parcel was found to contain \$6,000.00 in United States Currency in denominations of twenty dollar bills. A mail watch was placed on P.O. Box 5311, Wilmington, DE 19808.
12. On February 5, 2005, Postal Manager Greg Hansen of the Marshallton Station Post Office advised of an Express Mail Tracking #ED654662454US parcel coming from Little Rock, AR. Mr. Hansen was advised to over wrap the package and mail it to the attention of U.S. Postal Inspector Yvette Thomas, Philadelphia Division. The parcel was mailed via Express Mail #ED475546524US.
13. On February 8, 2005 your affiant received Express Mail Tracking No. ED654662454US which is addressed to [REDACTED] 19808 U.S.A. from [REDACTED] U.S.A measuring 12" 1/2" x 9 1/2" (letter flat) and weighing 3 ounces. Handwriting on all three packages were similar in characteristics.
14. On February 9, 2005, a federal search from the District of Delaware #05-10-M was signed by The Honorable Mary Pat Thyng for Express Mail Parcel #ED654662454US. The search warrant was executed on February 9, 2005 at approximately 10:16 a.m. in the presence of U.S. Postal Inspectors Yvette Thomas and Jane Mullin. The letter flat was found to contain \$5,000.00 in United States Currency in one hundred dollar denominations.
15. On March 31, 2005, Postmaster John Vitsorele of the Marshallton Station Post Office advised of two Express Mail parcels coming from Little Rock, AR. Mr. Vitsorele was advised to hold both parcels for pickup.

16. On March 31, 2005, your affiant received Express Mail Tracking No.

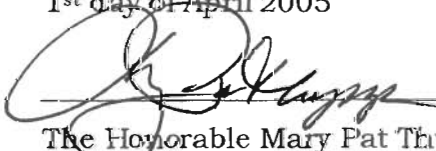
ED654664150US which is addressed to [REDACTED]  
[REDACTED] from [REDACTED]  
[REDACTED] 2116 measuring 15" x 14 1/2" x 6" and  
weighing 10 pounds and 14.8 ounces and post marked on March 30<sup>th</sup>, 2005;  
and Express Mail Tracking No. ED654664163US which is addressed to [REDACTED]  
[REDACTED] from [REDACTED]  
[REDACTED] 2116  
measuring 15 3/4" x 9" x 9" and weighing 8 pounds and 4 ounces and post  
marked on March 30<sup>th</sup> 2005.

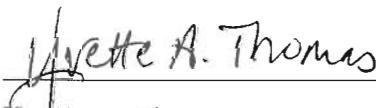
17. The subject parcels referred to herein is presently located at the U.S. Postal  
Inspection Service, Wilmington Domicile within the District of Delaware.

18. Based on the above information which your affiant believes to be true and  
correct, your affiant believes the subject parcels contain controlled substances,  
narcotic paraphernalia or proceeds from narcotic trafficking sent from Little  
Rock, AR to Wilmington, DE via overnight delivery services, and that the use of  
the overnight delivery services will facilitate the delivery of the United States  
Currency. Your Affiant, therefore seeks issuance of a search warrant for the  
seizure of this parcel, and the contents therein and any other evidence, fruits,  
instrumentalities, in violation of Title 21, United States Code, Sections  
841(a)(1), 843(b), 846, 853(a), and 881(a)(6).

19. Wherefore your affiant respectfully requests the court to find probable cause  
and issue a search warrant authorizing the opening and search of said parcels  
which are believed to contain controlled substances in violation of Title 21,  
United States Code, §§ 841(a)(1), 843(b), 846, 853(1) and 881(a)(6).

Sworn To and Subscribed Before Me This  
1<sup>st</sup> day of April 2005

  
The Honorable Mary Pat Thyng  
U.S. Magistrate Judge

  
Yvette A. Thomas  
U.S. Postal Inspector

